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	Page 1
UNITED STATES DISTRICT COURT	
NORTHERN DISTRICT OF OHIO	
EASTERN DIVISION	
) MDL No. 2804	
IN RE: NATIONAL PRESCRIPTION )	
OPIATE LITIGATION )	
) Case No. 17-md-2804	
THIS DOCUMENT RELATES TO: )	
ALL CASES )	
) Hon. Dan A. Polster	
HIGHLY CONFIDENTIAL	
SUBJECT TO FURTHER CONFIDENTIALITY REVIEW	
VIDEOTAPED DEPOSITION OF	
DEBORAH BISH	
February 1, 2019	
Toledo, Ohio	

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Page 62 Page 64 THE WITNESS: Oh, okay. ever contacting you after reviewing the suspicious 1 1 2 BY THE WITNESS: 2 order report and giving you any updates or information 3 3 A. Well, I think they are kind of the same at all? 4 thing. Did they get the information from that report? 4 MS. SWIFT: Objection; asked and answered. 5 BY THE WITNESS: 5 I don't know where they got their information. It 6 could have come off a computer screen, it could have 6 A. No. 7 7 come off of a report. I don't know. But if they had BY MR. GADDY: 8 a query that showed them that there was too much 8 Q. What is your understanding of what a 9 ordered, they would call the pharmacy manager. And if 9 suspicious order is? they couldn't get ahold of him, they would call me at 10 10 A. An order that would be suspicious because 11 home and I would just tell them put it on my desk 11 it's quantities that would be above the average 12 until I looked at it in the morning, called the 12 quantity ordered or the expected quantity ordered. 13 pharmacy manager. But whether -- where that 13 Q. How do you have that understanding? 14 information came from, was it a printed report, was it 14 Just by knowing what suspicious means, I A. 15 a disk, was it a -- I don't know. 15 mean. 16 BY MR. GADDY: 16 Q. Just the common definition of the term 17 17 "suspicious"? Q. Okay. And the purpose of that was to make 18 sure that somebody hadn't entered the number of pills A. Yeah. 18 19 they wanted instead of the number of bottles? 19 Q. Do you recall ever being provided any 20 MS. SWIFT: Object to form. 20 training or education by -- by Walgreens or attending 21 BY THE WITNESS: 21 any -- any DEA seminars about the -- the obligations 22 22 A. Well, the purpose of that was to make sure related to suspicious order monitoring? 23 that what they wanted -- what they ordered was what 23 A. No. 24 they intended to order and to make sure they really 24 MS. SWIFT: Object to the form. Page 63 Page 65 1 needed it. 1 BY MR. GADDY: 2 2 Q. Have you ever been -- ever attended any BY MR. GADDY: 3 Q. You were -- you were making sure they 3 DEA presentations in any form or fashion? hadn't entered an order by mistake? 4 4 A. No. 5 MS. SWIFT: Object to the form. 5 Q. Walgreens has never sent you to hear --6 BY THE WITNESS: б hear from DEA agents talk about diversion of 7 A. Well, not only that, but, yeah, that was 7 controlled substances or -- or the duties or 8 8 the case sometimes. Some -- sometimes they would obligations under the regulations? 9 enter 11 instead of 1 or whatever. But, yeah, and 9 A. No. 10 sometimes they actually needed a larger than normal 10 Q. I'll show you what I'll mark as Exhibit 11 quantity, and I would ask them why and they would tell 11 No. 5. This is P-GEN 10. 12 me why. And, you know, sometimes I would call Barb 12 (WHEREUPON, a certain document was 13 Martin who was our pharmacy inventory person who had 13 marked Walgreens - Bish Deposition 14 all of the -- you know, the history of their sales, 14 Exhibit No. 5, for identification, as 15 and say, Does this sound right to you? And she would 15 of 02/01/2019.) 16 say, Yeah, and then I would go ahead and dispense it. 16 BY MR. GADDY: 17 There was only one time that I recall ever calling a 17 Q. And this is -- if you look at the top of 18 store that they said, Yeah, I really do want that, and the page, this is a printout from a -- from the DEA 18 19 website. then they told me why, so. 19 20 Q. Okay. Let me go back to where I started 20 A. Uh-huh. 21 with this. 21 Q. And this is one particular regulation that 22 As far as that suspicious order report, 22 I'm just going to ask you if you've seen or if you are 23 23 familiar with. are you aware of anybody, whether it's the SAIL 24 24 coordinator, the computer room, corporate, anybody Do you see about a third of the way down

Page 66 Page 68 the page, it's a little bit faded, but it says BY MR. GADDY: 1 1 2 Title 21 Code of Federal Regulations? It is just 2 Q. Okay. 3 3 under the heading at the top. I'm sorry. A. I thought that because that's what I was A. Oh, up here. 4 4 told. 5 5 Q. Under the picture. Q. Okay. Who were you told that by? 6 A. Oh, okay. Yeah. 6 One of the programmers for C-II, Ann 7 7 Q. And then below that it says "Part 1301" Anaya, who I don't think is with the company any 8 and below that it says "Security Requirements" and 8 longer, but... 9 then it has the regulation 1301.74. 9 Q. Okay. Did she work at Perrysburg or 10 Do you see that? 10 somewhere else? 11 A. Um-hum. 11 A. At corporate. 12 Q. Okay. 12 Q. Okay. In what department? 13 During the course of your time as the C-II 13 A. The -- she was part of the programming 14 14 department. I don't know what they called it. IT, function manager, did you ever have the opportunity to review any of the federal regulations related to the 15 15 yeah. 16 distribution of controlled substances? 16 Q. And what did she tell you about that 17 A. I don't recall. 17 program? 18 Q. Do you recall anybody at Walgreens 18 A. She -- she didn't give me the details. 19 corporate or otherwise ever -- ever giving you these 19 She just said there is a program that -- that will 20 regulations or giving you any training on these 20 keep -- will bounce out orders that are above what 21 regulations? 21 they should be for their history, for their, you know, 22 22 A. I don't recall that either. history at that particular store. So if they normally 23 Okay. If you go down to paragraph (b), it 23 do a hundred of something and we get an order for 200 24 starts: "The registrant shall". 24 of something, that's going to throw that out and send Page 67 Page 69 1 A. Um-hum. 1 it back. 2 2 Q. Do you see where I am? Q. Okay. Did -- did she show you the policy 3 A. Um-hum. 3 or the procedure for how that worked? 4 O. And it says: 4 A. No. 5 5 Q. Do you know the timeframe in which she "The registrant shall design and operate a б system to disclose to the registrant suspicious orders б told you that was happening? 7 of controlled substances." 7 A. No, I have no idea. 8 8 Do you see that? Q. Did she talk to you at all about how that 9 A. Um-hum. 9 program changed over time or when that program was initiated? 10 Q. Did you know that that was an obligation 10 11 that Walgreens had under the federal regulations? 11 A. 12 MS. SWIFT: Object to the form. 12 Q. Okay. The paragraph (b) contin --13 BY THE WITNESS: 13 continues on to say: 14 14 "The registrant shall inform the Field A. I thought we did have a computer program 15 that did that. So this -- you know what I mean, 15 Division Office of the Administration in his area of 16 before the orders ever dropped, I thought we had a 16 suspicious orders when discovered by the registrant." 17 program that ferreted those out. 17 Do you see that? 18 18 BY MR. GADDY: A. Um-hum. 19 19 Q. Did -- at any time while you were the C-II Q. And you thought that based on seeing the 20 suspicious order report in the distribution center 20 function manager, did you ever contact the DEA 21 from time to time? 21 regarding an order of controlled substances that you 22 MS. SWIFT: Object to the form. 22 received? 23 BY THE WITNESS: 23 A. No. 24 24 A. No. Would that have been something that ever

Page 70 Page 72 would have occurred to you to do? received? 1 1 2 MS. SWIFT: Object to the form. 2 A. No. 3 BY THE WITNESS: 3 Q. So when you say you didn't fill the orders that were odd, that would mean the orders that jumped 4 A. Probably not because we didn't fill the 4 orders that were odd or large. You know, when I 5 5 off the page as being very large and would require a б called the store, like I said, there was only one case 6 follow-up phone call to the store to make sure that 7 7 that I remember that they actually said, Yes, I really they didn't make an error when they were typing in 8 want 80 of those or whatever. So, no, there was -- I 8 their order? 9 wouldn't have thought of calling them. 9 MS. SWIFT: Object to the form. BY MR. GADDY: 10 BY THE WITNESS: 10 11 Q. Okay. Well, when you say "orders that A. Well, to make sure that they didn't make 11 were odd or large," I mean, you -- you shipped to -- I an error or that they didn't really need it. But, 12 12 13 think we just saw over 5,000 different stores, 13 like I said, again, there was only one case where I 14 correct? 14 recall them actually saying, Yes, that's what I need. 15 A. Um-hum, um-hum. 15 BY MR. GADDY: 16 Q. And I'm sorry. You have to say yes or no 16 Q. Okay. Usually it was, Oh, shoot. I meant 17 for her. 17 3 and I typed 300? 18 18 A. Usually, yeah. A. Oh, yes. Sorry. 19 Q. And is it fair to say that -- that those 19 Q. And in those cases you would just delete 20 stores are in all different types of markets? 20 the 300 and put in a 3? 21 A. Right, that's fair to say, yeah. 21 A. Right. 22 22 Q. For example, there is a Walgreens in O. It goes on to say in paragraph (b), it 23 Perrysburg, is -- is there? 23 says: 24 Yes, um-hum. 24 "Suspicious orders include orders of Page 71 Page 73 1 Q. Okay. There is Walgreens in Cleveland, 1 unusual size, orders deviating substantially from a 2 2 correct? normal pattern, and orders of unusual frequency." 3 A. Yes. 3 Do you see that? 4 Chicago? 4 A. Um-hum. O. 5 5 A. Yep. Q. Prior to just now, right here today in б Q. So there is Walgreens in -- in big cities, б this deposition, had you ever read that subsection of 7 Walgreens in small towns, correct? 7 this regulation before? 8 8 A. I don't remember. I don't remember if I A. Right, yes. 9 Q. When you were looking at these orders, did 9 did or not. 10 you do any evaluation of the population size that --10 Q. Okay. Do you recall anybody at Walgreens that these stores were serving? 11 11 ever giving you any training regarding this topic? 12 12 A. Regarding orders deviating substantially A. No. 13 Q. Did you do any evaluation of how far the 13 all -- from a normal pattern, that -- no, because, 14 patients were traveling to get to those stores to have 14 again, that's something that I thought was done at 15 their prescriptions filled? 15 corporate. They have all of the sales history. In 16 A. No. 16 the DCs we don't have that. 17 Q. Did you do any evaluation of the numbers 17 Q. Okay. But you were the C-II function 18 and types of doctors that were writing the 18 manager at Perrysburg, correct? 19 prescriptions for these C-II drugs? 19 A. Yep, yep. 20 A. No. 20 Q. Okay. And you were the person, I think, 21 Q. Okay. 21 that Mr. Joseph said that your knowledge of C-IIs was 22 Every time that an order came in, did 22 second to none, correct? 23 23 you -- did you do an historical analysis on that Um-hum, yes. 24 24 particular store for every single order that you Okay. Let me show you another policy that

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Page 74
                                                                                                                        Page 76
      would have been in place when you started at the
                                                                             "The distribution center must file all
 1
                                                                 1
 2
      Perrysburg distribution center.
                                                                  2
                                                                      records for five years."
 3
                                                                  3
             I'll mark this as Exhibit No. 6.
                                                                             Do you see that?
 4
               (WHEREUPON, a certain document was
                                                                  4
                                                                            Yes.
 5
                                                                  5
                                                                         Q. Okay. The policy, you would agree with
               marked Walgreens - Bish Deposition
 6
               Exhibit No. 6, for identification, as
                                                                  6
                                                                      me, doesn't say that anything should be done with
 7
               of 02/01/2019.)
                                                                  7
                                                                      those reports other than file them?
 8
      BY MR. GADDY:
                                                                 8
                                                                         A. That's the only action I see, yes.
 9
         Q. Do you see the -- look at the bottom of
                                                                 9
                                                                         Q. Okay. And you are not aware of anybody at
      the page. Do you see the -- the web address for kind
                                                                      the distribution center doing any other action other
10
                                                                10
11
      of the -- the Walgreens Intranet?
                                                                      than just filing them, is that fair?
                                                                11
12
         A. This one down here?
                                                                12
                                                                         A. With this report, yes, if that's what you
13
         O. Yes, ma'am.
                                                                13
                                                                      are referring to.
14
         A. Yeah, um-hum, yes.
                                                                14
                                                                         Q. Okay.
         Q. Okay. And then it -- the top of the
15
                                                                15
                                                                             Let me ask you some questions now about
16
      page it's the -- one of the policies that was housed
                                                                16
                                                                      the process that you've told us a little bit about as
17
      there, "Handling Suspicious Drug Orders."
                                                                17
                                                                      far as spot-checking of -- of some of the orders that
            Do you see that?
18
                                                                18
                                                                      came in.
19
         A. Yes, yes.
                                                                19
                                                                             I'll show you what I'll mark as Exhibit
                                                                      No. 7.
20
         Q. And if you look at just below the
                                                                20
21
      paragraphs, it has the original date of the policy of
                                                                21
                                                                               (WHEREUPON, a certain document was
22
      September of '98.
                                                                22
                                                                                marked Walgreens - Bish Deposition
23
             Do you see that?
                                                                23
                                                                                Exhibit No. 7, for identification, as
24
                                                                24
                                                                                of 02/01/2019.)
         A.
             Yes.
                                                       Page 75
                                                                                                                       Page 77
 1
             And then the revised date of February 15,
                                                                 1
                                                                      BY MR. GADDY:
         Q.
 2
                                                                  2
                                                                         Q. Do you see the Walgreens policy -- the
      2005?
 3
         A. Right.
                                                                  3
                                                                      Walgreens logo at the top of this document?
 4
             Okay. And it says -- for the policy, it
                                                                  4
                                                                         A. Um-hum, yes.
         Q.
                                                                  5
 5
                                                                              And the subject here is: "Rx Questionable
      says:
 б
             "The Logistics and Planning Department
                                                                  б
                                                                      Order Quantity."
 7
      sends the suspicious control drug order reports" --
                                                                 7
                                                                             Do you see that?
      excuse me -- "suspicious control drug orders report to
                                                                         A.
 8
                                                                  8
                                                                              Yes.
 9
      all distribution centers."
                                                                 9
                                                                         Q. And the original date of this policy is
10
             Do you see that?
                                                                10
                                                                      12/11/2006.
                                                                             Do you see that?
11
         A. Um-hum.
                                                                11
12
         Q. And that's consistent with what you said
                                                                12
                                                                         A. Yes.
13
      that they would come in and -- and I think that the
                                                                13
                                                                         Q. And it looks like this is the original
14
      SAIL coordinator was in charge of that, right?
                                                                      policy as there is no revision date.
                                                                14
15
                                                                15
                                                                             Do you see that?
         A. Yes.
16
         Q. It says:
                                                                16
                                                                         A. Yes.
17
             "The report lists controlled drug orders
                                                                17
                                                                         Q. Okay. And this policy was written by
18
      that may be of unusual size for a store in its
                                                                18
                                                                      Shelley Crisel?
19
      category, of unusual frequency for a store in its
                                                                19
                                                                         A. That's what it says.
20
      category, or deviating from a normal pattern for a
                                                                20
                                                                              Do you know who that is?
21
      store in its category."
                                                                21
                                                                         A.
                                                                              No.
22
            Do you see that?
                                                                22
                                                                         Q.
                                                                              Okay.
23
                                                                23
                                                                              Someone at Mt. Vernon, I would assume. It
            Yep.
         A.
24
                                                                24
                                                                      was written at Mt. Vernon.
            It then goes on to say:
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Page 78 Page 80 Q. Okay. That's another distribution center? 1 1 THE WITNESS: Oh, sorry. 2 Yes, um-hum. 2 BY MR. GADDY: 3 3 Q. That would be what we'd call like And it says the Purpose of this policy is: front-of-store items? 4 "To establish procedures for verifying 4 5 questionable store order quantities on Rx items." 5 A. Yes. б Do you see that? 6 Q. Like paper towels, toilet paper, that type 7 7 of stuff? A. Yes. 8 And it says under the Scope: 8 A. Yes. 9 "This procedure covers the steps in 9 O. Was 24 the number of -- let me -- let me verifying questionable store order quantities prior to make sure that we are clear on that. 10 10 11 order processing on Rx items." So when -- when we say one SKU, if we are 11 12 Do you see that? 12 talking about a 100-count bottle of OxyContin, so a 13 A. Yes. 13 bottle with a hundred pills in it, that would be one 14 14 SKU? Q. And that's what you told us a little bit about that you would look for -- for orders that would A. Yes. 15 15 16 maybe -- maybe jump off the page as far as their size 16 Q. Okay. What was the number of SKUs or 17 and you would want to do some follow-up on those, units that it would require to flag for you to do any 17 18 correct? 18 type of follow-up phone call to the pharmacy? 19 A. Yes. 19 MS. SWIFT: Object to the form. BY THE WITNESS: 20 Q. Okay. Under Procedure under Section A, it 20 21 21 A. There wasn't really a number. It would says: 22 22 "The responsibilities of the computer room be -- generally any number in the triple would be a 23 personnel and SAIL team," it says, "Prior to Order 23 definite flag, anything over a hundred would be a 24 Processing." 24 definite flag, so. Page 79 Page 81 1 And in the first under No. 1 there, it 1 BY MR. GADDY: 2 2 Q. Okay. Is a hundred the number or was says: 3 "Once the transmissions have been received 3 there not a number or --4 from the stores to its fullest, you run a query for 4 A. There was not a number in particular. It 5 5 the" -- "for the cycle date and then it says: "Any Rx was any number -- any order that looked funny or б order greater than 24 SKUs." б didn't look right. There was no number that I used. 7 Do you see that? 7 The computer room did, apparently, but I didn't. 8 A. Um-hum. 8 Q. Okay. Now, when -- who would you get this 9 Q. SKUs means a unit? 9 report from? 10 A. Pieces, um-hum. 10 A. What report? 11 Q. Okay. So one bottle of pills would be one 11 MS. SWIFT: Objection to form. 12 SKU? 12 THE WITNESS: Sorry. 13 A. Yes. 13 BY MR. GADDY: 14 Okay. It says: 14 Q. This report that would show you the 15 "Any Rx order greater than 24 SKUs," or 15 quantities of -- of orders for you to look out and see 16 24 units, "of one item should print on a query in 16 if anything jumped off the page at you? 17 store numerical order along with SS items." 17 MS. SWIFT: Object to the form. 18 BY THE WITNESS: Do you see that? 18 19 A. There was no report that I got that A. Um-hum, yes. 19 O. What's SS items? 20 20 would -- that was just from the pickers is actually 21 A. Self serve. 21 who would find that if -- if they got an order for a Q. Okay. And that would be like which --22 22 hundred of something, they would go, This isn't right, 23 A. Non-Rx items. 23 and they would bring it to me and I would call the MS. SWIFT: Let him finish his question. 24 24 store. It wasn't a piece of paper form.

#### BY MR. GADDY: 1

2

- Q. Prior to the orders for C-IIs going to the
- 3 pickers for them to start -- and let me back up a
- little bit, because I used the term "pickers." I 4
- 5 think I know what that means, but let me make sure 6 it's clear.
- 7
  - Tell me in your words what a picker is?
- 8 A. A picker is the team member who actually 9 takes the product out of the vault and puts it in a
- 10 container that's going to go get audited and then
- 11 boxed and shipped to the store.
- 12 Q. Okay. And so these are people that are --
- 13 that are taking the pill bottles off the shelf,
- 14 putting them in the bag and they end up getting on the
- 15 truck?
- 16 A. Right.
- 17 Q. Okay. Prior to an order going to the
- 18 picker first for Schedule II drugs, is this -- this
- 19 review that you've told us about a couple of times
- 20 where you are looking for numbers that I think your
- 21 words were don't look right, triple digit orders,
- 22 anything that jumps off the page at you, is that
- 23 review done before the orders go to the pickers?
- 24 MS. SWIFT: Object to the form.

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1 2

10

15

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A. Uh-huh.

- - Q. -- that's something that takes how long?
- 3 MS. SWIFT: Object to the form.
- 4 BY THE WITNESS:
- 5 A. It depends. If the pharmacy manager is
- 6 available and answers the phone, it doesn't take very
- 7 long. If you have to wait for them to call you back,
- it could take longer.
- 9 BY MR. GADDY:
  - Q. It -- it is generally the same day?
- 11 A. Oh, yeah, um-hum.
- 12 Q. Okay. Are there ever occasions under this
- 13 policy where you are holding orders for -- for days or 14
  - weeks at a time before you fill them?
  - A. No.
- 16 Q. Okay. Are there ever occasions during
- 17 your time at C-II -- as the C-II function manager
- 18 where you are ever holding any orders for days or
- 19 weeks at a time for -- for any reason related to
- 20 investigating the order?
- 21 A. Not related to investigating the order.
- 22 Q. Okay. What would be a reason that you
- 23 would hold an order for days or weeks at a time?
- 24 Occasionally a new store would open late,

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- 1 so we'd be told we had to hold the order till they 2
- were ready to receive it.
- 3 Q. Okay. Any other reasons that you can
  - think of?

4

б

- 5 A. Not that I can think of.
  - Q. Okay. And when you say "a new store would
- 7 open late," that would be a situation where a store is
- 8 supposed to open on January 1st and it turns out they
- 9 don't open until February 1st and so all of the orders
- 10 that were ready to go out the door need to sit -- need
- 11 to sit in the -- the warehouse for an extra month?
- 12 A. In the vault, um-hum.
- 13 Q. Okay. And I'm sorry. You've got to say
- 14 yes or no.
- 15 A. Yes.
- 16 Q. Okay. So, as far as this process that
- 17 we've been talking about a little bit, it sounds like,
- 18 and tell me if I'm wrong, but it sounds like either
- 19 the computer room or the pickers, anybody that would
- 20 have identified these orders that -- that needed a
- 21 call to the -- a call to the store, that would have
- gone to you as the C-II function manager?
- 23 MS. SWIFT: Object to the form.
- 24 BY THE WITNESS:

22

Page 102 Page 104 Q. Okay. What I'm interested in is what 1 A. Yes. 1 2 BY MR. GADDY: 2 information or data you would have had to review --3 3 Q. Okay. Anybody other than you that would A. Uh-huh. Q. -- to help you answer the question of why 4 have been in charge of handling that issue? 4 5 MS. SWIFT: Object to the form. 5 do you need it? And it sounds like one piece of б BY THE WITNESS: 6 information or data would have been what was provided 7 7 A. Well, my lead if I wasn't there. I mean, verbally by the store? 8 I had someone that filled in when I was sick or on 8 A. By the pharmacy manager. 9 vacation. 9 Q. Okay. Any other information or data that 10 BY MR. GADDY: 10 you had at your disposal to consider why a particular 11 store might have needed a high quantity of C-IIs? O. Sure, sure. 11 12 But if you weren't -- if you were there 12 A. The only other source would have been 13 and you were working like normal course of business --13 Barb Martin, who I also would call on occasion. 14 A. Uh-huh. 14 Q. Okay. At --A. At corporate, not at the DC. 15 Q. -- the buck stopped with you as far as 15 16 following up on any of these orders that the computer 16 Q. Correct, correct. She didn't work in the 17 17 distribution center? room or the pickers flagged? 18 MS. SWIFT: Objection to form. 18 A. Uhn-uhn. 19 BY THE WITNESS: 19 Q. Okay. And -- okay. And you've told us 20 A. I would say yes. 20 that you recall calling her about this one particular 21 BY MR. GADDY: 21 order --22 22 Q. And one of the things that -- that you --A. Uh-huh. 23 that I think you said you did was first that you 23 Q. -- and that she -- presumably you passed 24 would -- your first question to the store would be, 24 on the information to her that you had received from Page 103 Page 105 the store? 1 Did you really mean to order this amount. 1 2 2 And it sounds like, and tell me if I'm A. Right. 3 wrong, but it sounds like every time but one the 3 Q. And she told you to fill the order? 4 answer was, Whoops, no, I didn't, reduce the order, is 4 Right. A. 5 5 that accurate? So would it be fair to say that the only б MS. SWIFT: Object to the form. б information you had that you had access to was 7 BY THE WITNESS: 7 whatever was provided to you by the store, and that to A. That's to my recollection. It could be 8 8 get other information, whether it's historical data 9 more, but that's all I can remember is one that I 9 or -- or patterns or whatnot, you would have to go actually... 10 10 through corporate via Barb Martin, is that fair? 11 BY MR. GADDY: 11 A. That's fair, yes. 12 Q. One time where you said, Hey, did you 12 Q. Okay. And you think -- and you think you 13 really mean to order this number and every time but 13 did that on -- on that one occasion? 14 one they told you it was a mistake? 14 A. Yes. 15 15 A. Yes. Q. Okay. 16 Q. Okay. And you said from there -- I think 16 Okay. So let's look at Paragraph C. I 17 you said the other thing that you would do is 17 guess it is III.C of this 2010 policy. Are you with me? 18 determine whether or not they really need that amount, 18 19 correct? 19 A. Yes. 20 A. Right, I would ask them why they needed it 20 Q. It says: "Responsibilities of Walgreens 21 and, actually, the case that I recall, and that's 21 company." 22 probably why I remember it, is she said she had a 22 And No. 1 says: "Suspicious store orders 23 patient that had 48 hours to live and she needed it 23 and inquiries are handled through the corporate office 24 24 for that patient. internal audit department."

Page 106 Page 108 meetings or training seminars where results of 1 Do you see that? 1 2 Yeah, I see that. 2 internal audits of Perrysburg were -- were discussed? 3 3 Q. What is the corporate office internal A. No, I don't remember any of those. 4 audit department? 4 Q. Okay. Did you know that -- that 5 5 A. It's a department where they do internal suspicious orders and inquiries were -- were handled б audits, but I couldn't tell you exactly what they do. 6 through the internal audit department? 7 7 MS. SWIFT: Object to the form. Q. Okay. 8 A. I don't know. 8 BY THE WITNESS: 9 Q. What do they do internal audits of? 9 A. No. MS. SWIFT: Objection; foundation. BY MR. GADDY: 10 10 11 BY THE WITNESS: Q. Do you ever recall being instructed or 11 A. I couldn't tell you. I don't know. 12 requested by anybody with internal audit to -- to edit 12 13 BY MR. GADDY: 13 or halt an order for C-IIs? 14 14 A. No. Q. How -- can you tell me any members of the 15 internal audit department? 15 Q. Do you ever be -- requested or advised by 16 A. Yarbrough is a familiar name, but I don't 16 anybody at Walgreens anywhere to -- to halt or edit a 17 really know if he was with internal audit. 17 C-II -- a C-II order? MS. SWIFT: Object to the form. 18 Q. You said Yarbrough? 18 19 A. Yeah. 19 BY THE WITNESS: 20 Q. But you don't know if he was with internal 20 A. Just the case I already gave you if -- was 21 audit or not? 21 if a store was going to open late, we were supposed to 22 22 A. Not for sure, uhn-uhn. hold it, yeah. 23 Q. Okay. Anybody else? 23 BY MR. GADDY: 24 A. I don't recall any other names, uh-uh. 24 Q. Okay. It goes on to say: Page 107 Page 109 1 Q. Okay. Do you ever recall anybody else 1 "Suspicious orders are then reported by 2 2 from internal audit ever coming to the distribution corporate to the FDA and/or DEA for controlled 3 center in Perrysburg? 3 substances within three days." A. If they did, they didn't tell me they were 4 4 Do you see that? 5 A. I see that. 5 with internal audit. I don't... б Q. Do you ever recall being asked to pull any б Q. Do you know whether or not that ever 7 information for internal audit? 7 happened? 8 8 A. No, I don't know. A. No. 9 Q. Ever being asked to pull any -- any data 9 Q. Did you have any visibility into that or reports for the internal -- internal audit process whatsoever? 10 10 11 committee or internal audit department? 11 A. No. 12 MS. SWIFT: Object to the form. 12 Q. Have you ever had any interaction with 13 BY THE WITNESS: 13 anybody at Walgreens regarding suspicious order 14 A. No. 14 monitoring? 15 BY MR. GADDY: 15 MS. SWIFT: Object to the form, vague. BY THE WITNESS: 16 Q. Do you know how many people make up the 16 17 internal audit department? 17 A. Other than conversations with Ann Anaya 18 where I knew there was a program regarding, you know, 18 A. No. 19 Q. Do you know whether or not the internal 19 suspicious orders, no. audit department has ever issued any reports or 20 20 BY MR. GADDY: 21 findings related to the Perrysburg distribution center Q. Okay. If you go to the next page, there 21 22 and its compliance with DEA regulations? 22 is actually a Roman numeral IV which is also new to 23 A. No, I don't. 23 the 2010 version. 24 24 Do you see that? Do you ever recall being a part of any

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2

8

1 Um-hum.

- 2 And it talks about training?
- 3 Yes.
- 4 And it says in No. 1, it says:
- 5 "The SAIL function manager will be
- б responsible for the training and enforcement of all
- 7 the procedures."
- 8 Do you see that?
- 9 A. Yes.
- Q. Are -- are you aware of -- of any training 10
- ever being provided on this policy to any of the team 11
- members at Perrysburg? 12
- 13 A. I'm not aware of this written policy being
- 14 given to anyone, the team members, if that's -- that's
- 15 what you are asking me.
- 16 Q. Okay. Do you recall any -- there being
- 17 any training or guidance given to, whether it's --
- 18 it's the folks in the computer room or the pickers on
- 19 what they are supposed to be looking for as far as
- 20 contacting you about these questionable orders that --
- 21 that you might need to check for accuracy?
- 22 A. Well, they just -- they just knew that if
- 23 it was -- they knew what was high because they picked
- 24 every day and they picked all stores every week, so
  - Page 111

  - they knew if something was unusually high. There
- 2 wasn't really training given to them to identify that.
- 3 Q. Did you -- I mean, they're -- you are --
- 4 this is talking about over 5,000 stores, right?
- 5 A. Um-hum.
- б Q. Would -- would it be safe to say that you,
- 7 when you see a store number, do you know what store
- 8 that is?

1

- 9 A. No.
- 10 Q. Okay. So if you see, I want to say the
- 11 store numbers were five digits?
- 12 A. Correct.
- 13 Q. So -- so if you saw Store 12345, that
- 14 doesn't -- you don't know that -- that, Oh, we're
- 15 talk -- that's the store in Perrysburg, Ohio, you
- 16 don't particularly know where that store is or what
- 17 population it serves or -- or what its typical
- 18 business is or anything like that, is that correct?
- 19 A. That's correct.
- 20 Q. Okay. So when you say the pickers do this
- every day and they know what they are seeing, you are 21
- 22 not telling me that -- that they know exactly how many
- 23 bottles Store 12345 typically gets on an average
- 24 order, are you?

- A. No, that's not what I'm telling you. 1
  - Q. Okay. You are just saying as a whole
- 3 chain wide they're -- they're aware of what comes in?

Page 112

- 4 A. They -- they are aware of what was
- 5 unusually large.
- 6 Q. On a chain-wide basis?
- 7 A. On a chain-wide basis, yes.
  - You -- do you see any -- any potential
- 9 problems or issues with using a chain-wide basis to
- 10 evaluate size of -- sizes of orders?
- MS. SWIFT: Object to the form. 11
- BY THE WITNESS: 12
- 13 A. Well, I mean, every store would be
- different based on where it's at. Some were in 14
- 15 hospitals, some were in corporate offices, so...
- 16 BY MR. GADDY:
- 17 Q. And -- and you would agree with me, it
- would be fair to say that a -- that a store at a 18
- 19 hospital is probably going to need more C-IIs than a
- 20 store in Perrysburg, Ohio?
- 21 A. Possibly, that would make sense.
- 22 Q. And -- and you agree with me that it would
- 23 be possible that there could be an unusually large
- 24 number of bottles for Perrysburg, but that might be a
- Page 113
- normal order of bottles for a hospital, is that fair? 1
- 2 A. That would be fair, um-hum.
- 3 Q. Okay. But you didn't have a daily
- 4 practice of calling all of the Walgreens stores and
- 5 hospitals, did you?
  - A. No.

б

- 7 Okay. So these or -- these orders that
- 8 were going to hospitals, those weren't popping on a
- 9 daily basis for you to follow up on, were they?
- 10 MS. SWIFT: Objection; foundation.
- 11 BY THE WITNESS:
- 12 A. No.
- 13 BY MR. GADDY:
- Q. Okay. So what you would see is normal 14
- orders for stores in a hospital setting were not high 15
- 16 enough to flag for you to do any follow-up calls or
- 17 investigation on, is that correct?
- MS. SWIFT: Objection; foundation. 18
- 19 BY THE WITNESS:
- 20 A. That would be correct, because what
- flagged them was, like, triple -- 300 of something. 21
- 22 Not even in a hospital do you need 300 of something.
- 23 I mean, that's what would flag them right away that
- 24 something was wrong.

Page 114 Page 116 BY MR. GADDY: 1 1 A. Okay. 2 Q. It had to be something crazy for it to 2 Q. I'm talking about what -- well, let me ask 3 3 you this: Did Matt refer to those as suspicious flag on this report for you to do a follow-up? A. Well, it had to be something large. I 4 4 orders? 5 5 A. I don't recall -don't know if I would say crazy, but yeah. 6 Q. Outside of being told by Anaya at some 6 Q. Okay. 7 -- his verbiage, no. 7 point in time for -- that -- that it -- excuse me --8 being told by Anaya at some point in time that at some 8 Q. I'm ask -- what I'm trying to ask about, 9 other point in time there was some type of system in 9 and -- and -- and I'm just going to be sus -- specific to the phrase "suspicious orders." 10 place ---10 11 A. Uh-huh. 11 A. Okay. Q. -- did you ever have any interaction with 12 Q. Because that's what's used here in this 12 13 anybody at Walgreens regarding suspicious orders? 13 policy as it relates to internal audit and that's what 14 MS. SWIFT: Object to the form and foundation. 14 I think you told me was on that report that the C-II -- that -- that Lori --15 BY THE WITNESS: 15 16 A. Just the computer room supervisor, 16 A. Right. 17 Matt Nye, the one we talked about earlier. 17 Q. -- who was the C-II SAIL coordinator, 18 BY MR. GADDY: 18 would get, correct? 19 Q. Okay. 19 A. Correct. 20 And what, if anything, would Matt tell you 20 O. Or -- or -- or Brook was the other one, 21 about -- and -- and I'm not talking about the 21 right? 22 22 questionable orders, the -- not -- not about these A. Um-hum. 23 policies and this procedure here. 23 Did you ever have any conversations or 24 24 interactions with anybody at Walgreens, other than A. Okay. Page 115 1 Q. But I'm asking specifically about the --1 this Anaya conversation you told us about, regarding 2 2 the suspicious order report that you said would come suspicious order reports or suspicious orders, and --3 into the C-II SAIL --3 and I'm confining it to that -- to that specific term? 4 A. Uh-huh. 4 MS. SWIFT: Object to the form. 5 5 Q. -- or -- or the suspicious orders that's BY THE WITNESS: б handled by internal audit. б A. Not that I recall. 7 Did you have -- did you have any 7 BY MR. GADDY: 8 8 conversations with Matt Nye about that suspicious Q. Okay. Do you know -- do you know a Mark 9 order report or -- or specifically the -- what 9 Betterridge? Walgreens referred to as suspicious orders? A. Yes. 10 10 MS. SWIFT: Object to the form of the question. 11 11 Who is Mark and what did he do? 12 BY THE WITNESS: 12 A. He is another function manager at the DC. 13 A. Suspicious orders would be the query he 13 Q. Okay. What is his purview -- what's under 14 ran, I -- that's how I understood it, and then I -- he his purview? 14 15 would talk to me about those. If he couldn't get 15 A. Right now he is in NAKL mod, one of our 16 ahold of the store, he would tell me. 16 pick mods. 17 Is that what -- the query you are talking 17 Q. Okay. Has he ever had any 18 about? No. 18 responsibilities whatsoever for controlled substances? 19 19 BY MR. GADDY: A. I didn't really follow C-III through V and 20 Q. What you are talking about is what we've 20 their activity when I was in receiving as a manager, 21 been talking about for the last hour or so? so I couldn't really answer that. He may have during 21 22 A. Um-hum. 22 that frame. I don't know. 23 23 Q. Okay. So no. I'm talking about something Q. He never had any responsibilities over 24 different than that. 24 C-IIs?

	Page 118		Page 120
1	A. No.	1	today?
2	Q. Okay. What about, do you know a person	2	Q. It was you can pull it out and look at
3	named James Gill?	3	it if you want to.
4	A. Yes.	4	A. Okay.
5	Q. And how do you know Mr. Gill?	5	Q. I think it's No. 1.
6	A. He is also another manager on night shift.	6	A. So No. 1 was about us taking over
7	Q. Okay. Has Mr. Gill ever had any	7	Jupiter's possibly taking over Ju Jupiter's
8	responsibilities for C-IIs?	8	orders.
9	A. No.	9	Q. Okay. And does it reference the, I think
10	Q. Okay. Do you know whether or not he had	10	the first sentence says: You probably heard what's
11	any responsibilities over C-III through Vs?	11	going on with the DEA?
12	A. He may have. I don't really remember. I	12	A. "You know what's happening in Jupiter with
13	don't remember.	13	the DEA" it says, yes.
14	Q. Okay. I'm going to show you what I'll	14	Q. Okay. And that's an April 2012 e-mail?
15	mark as Exhibit No. 9, and this is going to be what I	15	A. Yes.
16	believe is the final version of that same policy.	16	Are we done with that one?
17	(WHEREUPON, a certain document was	17	Q. Yes, ma'am. I was just trying to put it
18	marked Walgreens - Bish Deposition	18	in in kind of a time context.
19	Exhibit No. 9, for identification, as	19	So this policy you see is October 2013,
20	of 02/01/2019.)	20	correct?
21	BY MR. GADDY:	21	A. Correct.
22	Q. Do you see we are looking at the top of	22	Q. So this is going to be post-DEA issues in
23	the page another Walgreens document and it looks like	23	Jupiter, right?
24	the subject has changed now. It now says:	24	A. Yes.
	Page 119	+	Page 121
1	"Authentication of Prescription Order Policy"?	1	Q. Okay.
2	A. Right.	2	A. It's post the other, yeah.
3	Q. But if you look at the origination date,	3	Q. And it says here in Paragraph C, under
4			Q. This it says here in I drugfuph o, under
		4	Responsibilities of Walgreens and and this is
	it is the same, the 12/11/06?	4 5	Responsibilities of Walgreens, and and this is
5	A. Yes.	5	this paragraph this what's written here is
5 6	<ul><li>A. Yes.</li><li>Q. And you can look at it, you can scan it if</li></ul>	5	this paragraph this what's written here is different than what we saw in the last one, right?
5 6 7	A. Yes. Q. And you can look at it, you can scan it if you want, but it looks like Roman numerals I, II and	5 6 7	this paragraph this what's written here is different than what we saw in the last one, right?  A. Right.
5 6 7 8	A. Yes. Q. And you can look at it, you can scan it if you want, but it looks like Roman numerals I, II and III are identical to the one or excuse me at	5 6 7 8	this paragraph this what's written here is different than what we saw in the last one, right?  A. Right.  Q. The last one said that suspicious order
5 6 7 8 9	A. Yes. Q. And you can look at it, you can scan it if you want, but it looks like Roman numerals I, II and III are identical to the one or excuse me at least I, II, and III.A and B are going to be	5 6 7 8 9	this paragraph this what's written here is different than what we saw in the last one, right?  A. Right.  Q. The last one said that suspicious order monitoring was under the purview of the internal audit
5 6 7 8 9	A. Yes. Q. And you can look at it, you can scan it if you want, but it looks like Roman numerals I, II and III are identical to the one or excuse me at least I, II, and III.A and B are going to be identical.	5 6 7 8 9	this paragraph this what's written here is different than what we saw in the last one, right?  A. Right.  Q. The last one said that suspicious order monitoring was under the purview of the internal audit committee or internal audit department?
5 6 7 8 9 10	A. Yes. Q. And you can look at it, you can scan it if you want, but it looks like Roman numerals I, II and III are identical to the one or excuse me at least I, II, and III.A and B are going to be identical. A. That's what it looks like.	5 6 7 8 9 10 11	this paragraph this what's written here is different than what we saw in the last one, right?  A. Right.  Q. The last one said that suspicious order monitoring was under the purview of the internal audit committee or internal audit department?  A. Yes, um-hum.
5 6 7 8 9 10 11	A. Yes. Q. And you can look at it, you can scan it if you want, but it looks like Roman numerals I, II and III are identical to the one or excuse me at least I, II, and III.A and B are going to be identical. A. That's what it looks like. Q. Okay. And it looks like and we are	5 6 7 8 9 10 11	this paragraph this what's written here is different than what we saw in the last one, right?  A. Right.  Q. The last one said that suspicious order monitoring was under the purview of the internal audit committee or internal audit department?  A. Yes, um-hum.  Q. This one says: "The Walgreens strategic
5 6 7 8 9 10 11 12 13	A. Yes. Q. And you can look at it, you can scan it if you want, but it looks like Roman numerals I, II and III are identical to the one or excuse me at least I, II, and III.A and B are going to be identical. A. That's what it looks like. Q. Okay. And it looks like and we are going to talk about some of the changes, but first you	5 6 7 8 9 10 11 12 13	this paragraph this what's written here is different than what we saw in the last one, right?  A. Right.  Q. The last one said that suspicious order monitoring was under the purview of the internal audit committee or internal audit department?  A. Yes, um-hum.  Q. This one says: "The Walgreens strategic inventory management system."
5 6 7 8 9 10 11 12 13	A. Yes. Q. And you can look at it, you can scan it if you want, but it looks like Roman numerals I, II and III are identical to the one or excuse me at least I, II, and III.A and B are going to be identical. A. That's what it looks like. Q. Okay. And it looks like and we are going to talk about some of the changes, but first you see up up at the top, this is the October 2013	5 6 7 8 9 10 11 12 13 14	this paragraph this what's written here is different than what we saw in the last one, right?  A. Right.  Q. The last one said that suspicious order monitoring was under the purview of the internal audit committee or internal audit department?  A. Yes, um-hum.  Q. This one says: "The Walgreens strategic inventory management system."  And you're familiar with SIMS?
5 6 7 8 9 10 11 12 13 14	A. Yes. Q. And you can look at it, you can scan it if you want, but it looks like Roman numerals I, II and III are identical to the one or excuse me at least I, II, and III.A and B are going to be identical. A. That's what it looks like. Q. Okay. And it looks like and we are going to talk about some of the changes, but first you see up up at the top, this is the October 2013 policy, or or I should say version of policy,	5 6 7 8 9 10 11 12 13 14	this paragraph this what's written here is different than what we saw in the last one, right?  A. Right.  Q. The last one said that suspicious order monitoring was under the purview of the internal audit committee or internal audit department?  A. Yes, um-hum.  Q. This one says: "The Walgreens strategic inventory management system."  And you're familiar with SIMS?  A. Yes.
5 6 7 8 9 10 11 12 13 14 15	A. Yes. Q. And you can look at it, you can scan it if you want, but it looks like Roman numerals I, II and III are identical to the one or excuse me at least I, II, and III.A and B are going to be identical. A. That's what it looks like. Q. Okay. And it looks like and we are going to talk about some of the changes, but first you see up up at the top, this is the October 2013 policy, or or I should say version of policy, correct?	5 6 7 8 9 10 11 12 13 14 15	this paragraph this what's written here is different than what we saw in the last one, right?  A. Right.  Q. The last one said that suspicious order monitoring was under the purview of the internal audit committee or internal audit department?  A. Yes, um-hum.  Q. This one says: "The Walgreens strategic inventory management system."  And you're familiar with SIMS?  A. Yes.  Q. And that's your online ordering system?
5 6 7 8 9 10 11 12 13 14 15 16 17	A. Yes. Q. And you can look at it, you can scan it if you want, but it looks like Roman numerals I, II and III are identical to the one or excuse me at least I, II, and III.A and B are going to be identical. A. That's what it looks like. Q. Okay. And it looks like and we are going to talk about some of the changes, but first you see up up at the top, this is the October 2013 policy, or or I should say version of policy, correct? A. Correct.	5 6 7 8 9 10 11 12 13 14 15 16 17	this paragraph this what's written here is different than what we saw in the last one, right?  A. Right. Q. The last one said that suspicious order monitoring was under the purview of the internal audit committee or internal audit department?  A. Yes, um-hum. Q. This one says: "The Walgreens strategic inventory management system."  And you're familiar with SIMS?  A. Yes. Q. And that's your online ordering system? A. Operating system, uh-huh.
5 6 7 8 9 10 11 12 13 14 15 16 17	A. Yes. Q. And you can look at it, you can scan it if you want, but it looks like Roman numerals I, II and III are identical to the one or excuse me at least I, II, and III.A and B are going to be identical. A. That's what it looks like. Q. Okay. And it looks like and we are going to talk about some of the changes, but first you see up up at the top, this is the October 2013 policy, or or I should say version of policy, correct? A. Correct. Q. Okay. And so this would be after	5 6 7 8 9 10 11 12 13 14 15 16 17	this paragraph this what's written here is different than what we saw in the last one, right?  A. Right.  Q. The last one said that suspicious order monitoring was under the purview of the internal audit committee or internal audit department?  A. Yes, um-hum.  Q. This one says: "The Walgreens strategic inventory management system."  And you're familiar with SIMS?  A. Yes.  Q. And that's your online ordering system?  A. Operating system, uh-huh.  Q. Okay. It says:
5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Yes. Q. And you can look at it, you can scan it if you want, but it looks like Roman numerals I, II and III are identical to the one or excuse me at least I, II, and III.A and B are going to be identical. A. That's what it looks like. Q. Okay. And it looks like and we are going to talk about some of the changes, but first you see up up at the top, this is the October 2013 policy, or or I should say version of policy, correct? A. Correct. Q. Okay. And so this would be after excuse me one of the one of the	5 6 7 8 9 10 11 12 13 14 15 16 17 18	this paragraph this what's written here is different than what we saw in the last one, right?  A. Right. Q. The last one said that suspicious order monitoring was under the purview of the internal audit committee or internal audit department?  A. Yes, um-hum. Q. This one says: "The Walgreens strategic inventory management system."  And you're familiar with SIMS?  A. Yes. Q. And that's your online ordering system?  A. Operating system, uh-huh. Q. Okay. It says:  "So the Walgreens SIMS will stop what
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Yes. Q. And you can look at it, you can scan it if you want, but it looks like Roman numerals I, II and III are identical to the one or excuse me at least I, II, and III.A and B are going to be identical. A. That's what it looks like. Q. Okay. And it looks like and we are going to talk about some of the changes, but first you see up up at the top, this is the October 2013 policy, or or I should say version of policy, correct? A. Correct. Q. Okay. And so this would be after excuse me one of the some of the one of the first documents we looked at were some of those, I	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	this paragraph this what's written here is different than what we saw in the last one, right?  A. Right. Q. The last one said that suspicious order monitoring was under the purview of the internal audit committee or internal audit department?  A. Yes, um-hum. Q. This one says: "The Walgreens strategic inventory management system."  And you're familiar with SIMS?  A. Yes. Q. And that's your online ordering system?  A. Operating system, uh-huh. Q. Okay. It says:  "So the Walgreens SIMS will stop what would be considered suspicious controlled drug orders
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Yes. Q. And you can look at it, you can scan it if you want, but it looks like Roman numerals I, II and III are identical to the one or excuse me at least I, II, and III.A and B are going to be identical. A. That's what it looks like. Q. Okay. And it looks like and we are going to talk about some of the changes, but first you see up up at the top, this is the October 2013 policy, or or I should say version of policy, correct? A. Correct. Q. Okay. And so this would be after excuse me one of the some of the one of the first documents we looked at were some of those, I think it was an April 2012 e-mail where they were	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	this paragraph this what's written here is different than what we saw in the last one, right?  A. Right.  Q. The last one said that suspicious order monitoring was under the purview of the internal audit committee or internal audit department?  A. Yes, um-hum.  Q. This one says: "The Walgreens strategic inventory management system."  And you're familiar with SIMS?  A. Yes.  Q. And that's your online ordering system?  A. Operating system, uh-huh.  Q. Okay. It says:  "So the Walgreens SIMS will stop what would be considered suspicious controlled drug orders from being released for picking at the DC based on the
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Yes. Q. And you can look at it, you can scan it if you want, but it looks like Roman numerals I, II and III are identical to the one or excuse me at least I, II, and III.A and B are going to be identical. A. That's what it looks like. Q. Okay. And it looks like and we are going to talk about some of the changes, but first you see up up at the top, this is the October 2013 policy, or or I should say version of policy, correct? A. Correct. Q. Okay. And so this would be after excuse me one of the some of the one of the first documents we looked at were some of those, I think it was an April 2012 e-mail where they were discussing the DEA concerns in Jupiter.	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	this paragraph this what's written here is different than what we saw in the last one, right?  A. Right.  Q. The last one said that suspicious order monitoring was under the purview of the internal audit committee or internal audit department?  A. Yes, um-hum.  Q. This one says: "The Walgreens strategic inventory management system."  And you're familiar with SIMS?  A. Yes.  Q. And that's your online ordering system?  A. Operating system, uh-huh.  Q. Okay. It says:  "So the Walgreens SIMS will stop what would be considered suspicious controlled drug orders from being released for picking at the DC based on the algorithm that looks at past sales and order
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Yes. Q. And you can look at it, you can scan it if you want, but it looks like Roman numerals I, II and III are identical to the one or excuse me at least I, II, and III.A and B are going to be identical. A. That's what it looks like. Q. Okay. And it looks like and we are going to talk about some of the changes, but first you see up up at the top, this is the October 2013 policy, or or I should say version of policy, correct? A. Correct. Q. Okay. And so this would be after excuse me one of the some of the one of the first documents we looked at were some of those, I think it was an April 2012 e-mail where they were	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	this paragraph this what's written here is different than what we saw in the last one, right?  A. Right.  Q. The last one said that suspicious order monitoring was under the purview of the internal audit committee or internal audit department?  A. Yes, um-hum.  Q. This one says: "The Walgreens strategic inventory management system."  And you're familiar with SIMS?  A. Yes.  Q. And that's your online ordering system?  A. Operating system, uh-huh.  Q. Okay. It says:  "So the Walgreens SIMS will stop what would be considered suspicious controlled drug orders from being released for picking at the DC based on the

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1 A. Yes.

- 2 Q. And does that sound familiar to what Anaya
- 3 told you when you asked her about that?
- 4 A. Yes.
- 5 Q. Okay. And that would be what we see in
- б this October of 2013 policy, correct?
  - A. Correct.
- 8 Okay. So, let me ask you this: Were you
- aware that orders were being either cut or -- or 9
- blocked from coming into the distribution center for 10
- 11 C-IIs?

7

- 12 MS. SWIFT: Object to the form.
- 13 BY THE WITNESS:
- 14 A. Do you mean prior to '13 or after? When?
- 15 At any time?
- 16 BY MR. GADDY:
- 17 Q. At any time.
- 18 A. Well, the program would have, this program
- 19 that we just read about, my understanding was that
- 20 would not allow orders to come in that were above what
- 21 was reasonable for their location and history and
- 22 whatever.
- 23 Q. Okay. And you had that understanding at
- 24 the time or you have that understanding from looking

- Correct? 1 O.
  - Not that I noticed.
- 3 Q. Okay.
- 4 Not that I was aware of.
  - You still -- I'm sorry.
- 6 A. Not that I was aware of.
  - You still had orders come in every day and

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- 8 you still processed those orders every day?
- 9 A. Correct.
- 10 Q. You still ran this, had the computer room
- and the pickers be looking out for potential orders 11
- 12 that were entered in error?
- 13 A. Correct.
- 14 Q. You continued to place phone calls to
- 15 stores if you saw something very large that you
- 16 thought might be inaccurate?
- 17 A. Correct.
- 18 Q. Okay. If you look at the very bottom
- 19 right-hand corner, do you see there is some Bates
- 20 numbering down there?
- A. The WAGMD? 21
- 22 O. Yes, ma'am.
- 23 Uh-huh.
- 24 Q. If you'd turn for me, please, to the

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#### 1 at this document?

- 2 A. Oh, I had that understanding at the time.
- 3 Q. Okay. How, if at all, did that impact
- 4 what you did in the distribution center?
- 5 MS. SWIFT: Object to the form.
- б BY THE WITNESS:
- 7 A. In regards to what, how we handled large
- orders or how...? 8
- 9 BY MR. GADDY:
- 10 Q. To any part, any portion of your job?
- 11 MS. SWIFT: Object to the form.
- 12 BY THE WITNESS:
- 13 A. So how did that change our -- it -- it
- 14 didn't change anything we did. We still called stores
- 15 if we got something that was too high.
- 16 BY MR. GADDY:
- 17 Q. Okay. I didn't think it did. I just
- 18 wanted to make sure.
- 19 A. Yeah.
- 20 Q. But -- okay. So nothing changed from your
- perspective once -- once SIMS started reducing or 21
- 22 cutting orders?
- 23 MS. SWIFT: Object to the form.
- 24 BY MR. GADDY:

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			116 (Pages 458 to 461)

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			120 (Pages 474 to 477)

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